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Case 2:10-cv-10978-PJD-MJH

UNITED STATES DISTRICT COURT  
IN THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA,  
COLLEGE OF MEDICINE, a foreign corporation,

Plaintiff,

V

CASE No.: 2:10-cv-10978-PJD-MJH  
Judge Patrick J. Duggan  
Judge Michael Hluchaniuk, referral

STEVEN WOODWARD,

Defendant,

**Defendant's Response to Plaintiff's Motion for Protective Order**

U.S. DIST. COURT CLERK  
EAST DIST. HIGH  
CLERK

2011 JAN 31 P 12:01

FILED

## **Defendant's Response to Plaintiff's Motion for Protective Order**

### **List of Exhibits:**

Exhibit 1: Email Defendant's request for discovery

Exhibit 2: Defendant's requested Interrogatories, Admissions, and Documentation

Exhibit 3: Email Request for discovery during December 22, 2010 hearing

Exhibit 4: Plaintiff's answers to Defendant's Admissions

The Defendant requested Discovery from the Plaintiff on November 22, 2010, **Exhibit 1**, bottom.

The Defendant's requested Interrogatories, Admissions, and Documentation from the Plaintiff as demonstrated in **Exhibit 2**.

The Plaintiff requested a Word version of the Defendants discovery material on November 23, 2010. In Good Faith the Defendant replied with the Plaintiff's request on November 23, 2010, **Exhibit 1**, top.

On December 14, 2010 the Plaintiff sent the Defendant an email concerning discovery, the Defendant replied to this email, **Exhibit 3**; in the response the Defendant requested the Plaintiff provide the documentation and answers during the December 22, 2010 hearing.

**"Please plan on bringing all of the documentation and answers as I previously requested to the December 22nd Hearing so we don't need to be further burdened over the holidays."**

The Defendant, in good faith, brought all the documentation and answers to all the Plaintiff's requests for discovery.

The Plaintiff in, **BAD FAIT**, brought **NO Discovery documentation** to the hearing....

The Plaintiff refused to review or even take any of the discovery answers or documentation the Defendant brought to the hearing, demonstrating the BAD FAITH burdening and harassing character of this Plaintiff.

During the December 22, 2010 hearing the Plaintiff implied that they would provide the requested Discovery.

The Plaintiff responded to the Defendant with only answers to Admissions, **Exhibit 4**.

Out of 56 requests the Plaintiff objected, in **Bad Faith**, to all but the following:

Request 20

Request 38 "Can not admit or deny"

Request 45

Request 52

The Plaintiff in **BAD FAITH** has **NOT** provided the Defendant any of the requested documentation or answers and documentation relating to the Defendant's Interrogatories.

The Plaintiff still refuses to provide the Defendant with any information concerning the ownership of the said "American University of Antigua".

The Defendant requests the Court not only **DENY** the Plaintiff's request for Protective Order, but also do all in the Courts power to ensure the Plaintiff, their partners, and the Industry organizations and companies associated with this Plaintiff comply with the Defendant's discovery.

Steven Woodward  
7211 Brittwood Ln  
Flint, MI 48507  
(810)235-7267

A handwritten signature in black ink, appearing to read "S Woodward", with a long horizontal flourish extending to the right.

**From:** Steve Woodward (steve\_l\_woodward@yahoo.com)  
**To:** kzalewski@cardellilaw.com;  
**Date:** Tue, November 23, 2010 2:36:59 PM  
**Cc:**  
**Subject:** Re: AUA-Woodward

Here are the Word copies.

This email and any attachments are intended for the sole use of the named recipient(s) and contain(s) confidential information that may be proprietary, privileged or copyrighted under applicable law. If you are not the intended recipient, do not read, copy, or forward this email message or any attachments. Delete this email message and any attachments immediately.

---

**From:** Kathryn Zalewski <kzalewski@cardellilaw.com>  
**To:** Steve Woodward <steve\_l\_woodward@yahoo.com>  
**Sent:** Tue, November 23, 2010 11:05:24 AM  
**Subject:** RE: AUA-Woodward

Please forward me the word version of your discovery responses and request for admission for ease in responding.

Thank you.

---

**From:** Steve Woodward [mailto:steve\_l\_woodward@yahoo.com]  
**Sent:** Monday, November 22, 2010 4:01 PM  
**To:** Kathryn Zalewski; Eric A Buikema  
**Subject:** AUA-Woodward

Mr. Buikema,

Attached is:  
Defendant's Interrogatories to Plaintiff  
Defendant's Request for Documentation  
Defendant's Request for Admissions  
Certificate of Service

I will send a copy of the documents to you via US Mail.

Steven Woodward

This email and any attachments are intended for the sole use of the named recipient(s) and contain(s) confidential information that may be proprietary, privileged or copyrighted under applicable law. If you are not the intended recipient, do not read, copy, or forward this email message or any attachments. Delete this email message and any attachments immediately.

**EXHIBIT**

**1**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA COLLEGE  
OF MEDICINE, Plaintiff

United States District Court  
Judge Patrick J. Duggan, presiding  
Michael Hluchaniul, referral  
Case No.: 2:10-cv-10978

V  
Steven Woodward, Defendant

Eric A. Buikema (P58379)  
Cardelli, Lanfear & Buikema, P.C.  
Attorneys for Plaintiff  
322 W. Lincoln  
Royal Oak, MI 48067  
(248)544-1100  
ebuikema@cardellilaw.com

Steven Woodward  
7211 Brittwood Ln  
Flint, MI 48507  
steve\_l\_woodward@yahoo.com

---

**Certificate Of Service**

The undersigned certifies that the foregoing Defendant's Requests for Admissions, Defendant's Interrogatories to Plaintiff, Defendant's Requests for Production Pursuant to FRCP 34, and Defendant's Request for Documentation, and this Certificate of Service were served upon the Plaintiff via email addresses kzalewski@cardellilaw.com and ebuikema@cardellilaw.com and US Mail to Eric Buikema, 322 W. Lincoln, Royal Oak, MI 48067, on November 22, 2010.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA COLLEGE  
OF MEDICINE Plaintiff

United States District Court  
Judge Patrick J. Duggan, presiding  
Michael Hluchaniuk, referral  
Case No.: 2:10-cv-10978

V  
Steven Woodward, Defendant

Eric A. Buikema (P58379)  
Cardelli, Lanfear & Buikema, P.C.  
Attorneys for Plaintiff  
322 W. Lincoln  
Royal Oak, MI 48067  
(248)544-1100  
ebuikema@cardellilaw.com

Steven Woodward  
7211 Brittwood Ln  
Flint, MI 48507  
steve\_L\_woodward@yahoo.com

**Defendant's Interrogatories to Plaintiff**

### **Defendant's Interrogatories to Plaintiff**

Defendant Steven Woodward submits the following interrogatories to the Plaintiff to be answered fully and under oath. Pursuant to Fed. R. Civ. P. 33(a)(2), you have 30 days from being served to respond. Fed. R. Civ. P. 26(e) imposes a duty upon you to timely supplement your responses.

Definitions: AUA is defined as American University of Antigua College of Medicine, Greater Caribbean Learning Resources, GCLR, and any partners of the University.

Interrogatories 1. How many American University of Antigua College of Medicine students have died on Antigua? If any, list the date of the incident and cause of death for each student and provide all AUA student notices, student warnings, reports, and all corrective action taken by AUA for each incident.

Response:

Interrogatories 2. How many people have been murdered on Antigua between January 2004 and November 2010? If any, list the date of the incident, age of the victim, and cause of each death and provide all AUA student notices, student warnings, reports, and all safety corrective actions taken by AUA for each incident.

Response:

Interrogatories 3. How many American University of Antigua College of Medicine students have been murdered on Antigua? If any, list the date of the incident, age of the victim, and cause of death for each student, incident details and documentation and provide all AUA student notices, student warnings, reports, and all safety corrective actions taken by AUA for each incident.

Response:

Interrogatories 4. How many people have been found guilty of sex offenses on Antigua between January 2004 and November 2010? If any, list the date and the age of the victim for each incident and provide all AUA student notices, student warnings, reports, and all safety corrective actions taken by AUA for each incident.

Response:

Interrogatories 5. How many American University of Antigua College of Medicine students have been a victim of any sexual offense on Antigua? If any, list the date and the age of the victim for each incident, incident details, and provide all AUA student notices, student warnings, reports, and all safety corrective actions taken by AUA for each incident.

Response:



Interrogatories 6. How many people have been robbed on Antigua between January 2004 and November 2010? If any, list the date and details for each incident and provide all AUA student notices, student warnings, reports, and all safety corrective actions taken by AUA for each incident.

Response:

Interrogatories 7. How many American University of Antigua College of Medicine students have been victims of robbery on Antigua? If any, list the date and the age of the victim for each incident and provide all AUA student notices, student warnings, reports, and all safety corrective actions taken by AUA for each incident.

Response:

Interrogatories 8. How many people have been assaulted on Antigua between January 2004 and November 2010? If any, list the date and details for each incident and provide all AUA student notices, student warnings, reports, and all safety corrective actions taken by AUA for each incident.

Response:

Interrogatories 9. How many American University of Antigua College of Medicine students have been victims of assault on Antigua? If any, list the date and the age of the victim for each incident and provide all AUA student notices, student warnings, reports, and all safety corrective actions taken by AUA for each incident.

Response:

Interrogatories 10. How many people have been found guilty of burglary on Antigua between January 2004 and November 2010?

If any, list the date and details for each incident and provide all AUA student notices, student warnings, reports, and all safety corrective actions taken by AUA for each incident.

Response:

Interrogatories 11. How many American University of Antigua College of Medicine students have been victims of any burglary on Antigua? If any, list the date and the age of the victim for each incident and provide all AUA student notices, student warnings, reports, and all safety corrective actions taken by AUA for each incident.

Response:

Interrogatories 12. How many vehicles have been stolen on Antigua between January 2004 and November 2010? If any, list the date and details for each incident and provide

all AUA student notices, student warnings, reports, and all safety corrective actions taken by AUA for each incident.

Response:

Interrogatories 13. How many American University of Antigua College of Medicine students have been victims of auto theft on Antigua? If any, list the date and the age of the victim for each incident and provide all AUA student notices, student warnings, reports, and all safety corrective actions taken by AUA for each incident.

Response:

Interrogatories 14. How many people have been found guilty of manslaughter on Antigua between January 2004 and November 2010? If any, list the date and details of each victim, including nationality, age, and if they were a student and provide all AUA student notices, student warnings, reports, and all safety corrective actions taken by AUA for each incident.

Response:

Interrogatories 15. How many American University of Antigua College of Medicine students have been victims of manslaughter on Antigua? If any, list the date and the age of the victim for each incident and provide all AUA student notices, student warnings, reports, and all safety corrective actions taken by AUA for each incident.

Response:

Interrogatories 16. How many people have been found guilty of arson on Antigua between January 2004 and November 2010? If any, list the date and details of each incident and provide all AUA student notices, student warnings, reports, and all safety corrective actions taken by AUA for each incident.

Response:

Interrogatories 17. How many American University of Antigua College of Medicine students have been victims of arson on Antigua? If any, list the date and the age of the victim for each incident and provide all AUA student notices, student warnings, reports, and all safety corrective actions taken by AUA for each incident.

Response:

Interrogatories 18. Has AUA been investigated by the FBI? If so, list the date and details for each, including outcome.

Response:

Interrogatories 19. What is the USMLE Step 1 first-time pass rates for all AUA students since 2004?

Response:

Interrogatories 20. Please state the reason AUA does not use the domain name "auamed.edu.ag"?

Response:

Interrogatories 21. Has AUA been named in a lawsuit? If so,

- a. List the nature of the lawsuit,
- b. List the date of the lawsuit,
- c. List the court and location

Response:

Interrogatories 22. Separately for each person who has knowledge of any fact relevant to this lawsuit(s), state:

- a. The person's name, address, telephone number, employer address, employer telephone number;
- b. The facts known to the witness;
- c. The relationship of the witness to any party to this litigation, if any;
- d. Produce all documents relating to this witness and/or his or her testimony, including statements, notes of conversations, memorandums, correspondence, reports, or any other records, written, electronic or otherwise.

Response:

Interrogatories 23. Separately for every oral communication between defendant or anyone acting on its behalf and this plaintiff or anyone acting on its behalf relating to any fact relevant to this lawsuit:

- a. State the substance of the communication;
- b. State the date the communication occurred;
- c. Identify by name, address, telephone number and employer all parties to the communication;
- d. Produce all documents or records relating to or evidencing the communication.

Response:

Interrogatory 24. Has the Plaintiff, any partner, owner, and/or parent company ever been party to a lawsuit before, including any bankruptcy proceeding, worker's compensation proceeding or divorce? If so, please provide

- a. the name of case including the names of parties, the state, county and court, and the country where it was filed, the year it was filed; and
- b. a brief description of the issue(s) in the case.

Response:

Interrogatory 25. Has any employee of the Plaintiff been treated for a mental health condition or issue? If so, Please list separately the employee name, their providers name, address and telephone number for every mental health professional each employee has consulted, been examined by or seen in the last 10 years.

Response:

Interrogatory 26. Has Neal S. Simon been treated for a mental health condition or issue? If so, Please provide the name, address and telephone number for every mental health professional each employee has consulted, been examined by or seen in the last 10 years.

Response:

Interrogatory 27. Employment History for every employee of Greater Caribbean Learning Resources, GCLR, and American University of Antigua College of Medicine; Provide the name, address, telephone number of every place where every employee has worked in the last 15 years. Separately for each employee list the name of each employer, provide title, rate of compensation, dates of employment and the name of the person to whom each reported.

Response:

Interrogatory 28. Has the American University of Antigua College of Medicine or Greater Caribbean Learning Resources, GCLR ever released, fired, suspended, disciplined, or removed any employee? If so, for each case provide the employee name, work position, work responsibilities, compensations, details relating to the incident, the name of all persons involved, and all documentation concerning the incident.

Response:

Interrogatory 29. Has any hospital refused to partner with American University of Antigua College of Medicine? If so, for each case provide the hospital name, list each person involved and all records concerning each case.

Response:

Interrogatory 30. Has any hospital partner of American University of Antigua College of Medicine discontinued any partnership or program with American University of Antigua College of Medicine? If so, for each case provide the hospital name, hospital contact information, the name of each person involved and all records concerning each case.

Response:

Interrogatory 31. How many Grievance Committee Meetings has American University of Antigua College of Medicine held? For each separate meeting produce the name of each student involved, the student contact information, the student home address, student email addresses, student telephone numbers, the nature of the grievance, all meeting minutes, all documentation, all recordings, all evidence, witness list, name of each faculty presiding, name of each faculty involved, all notices, and outcome.

Response:

Interrogatory 32. How many students have been dismissed from American University of Antigua College of Medicine? For each separate incident produce the name of each student involved, the student contact information, the student home address, student email addresses, student telephone numbers, the nature of dismissal, all meeting minutes, all documentation concerning each case, all recordings, all evidence, witness list, name of each faculty involved.

Response:

Interrogatory 33. How many students have appealed grades assigned to them by faculty of American University of Antigua College of Medicine? For each separate incident produce the name of each student involved, the student contact information, the student home address, student email addresses, student telephone numbers, the class, the name of the faculty that taught the class, and outcome.

Response:

Interrogatory 34. How many students have appealed Grievance Committee Meeting decisions of American University of Antigua College of Medicine? For each separate appeal produce the name of each student involved, the student contact information, the student home address, student email addresses, student telephone numbers, and outcome.

Response:

Interrogatory 35. State the names, and positions held of any and all individual(s) who participated in the Grievance Committee hearing against Steven Woodward in December, 2007.

Response:

Interrogatory 36. How many Grievance Committee hearings against AUA students took place between 2004 and 2010?

Response:

Interrogatory 37. State the outcome and/or recommendation resulting from each of the Grievance Committee hearings against AUA students between 2004 and 2010.

Interrogatory 38. State the reason AUA discontinued access to [stevenw@auamed.net](mailto:stevenw@auamed.net) to Steven Woodward after December, 2007?

Response:

Interrogatory 40. Provide the username and password to the account [stevenw@auamed.net](mailto:stevenw@auamed.net).

Response:

Interrogatory 41. Has AUA deleted any information from the user email account stevenw@auamed.net? If so, state the reason why, the date information was deleted, and nature of the information that was deleted.

Response:

Interrogatory 42. Provide the full name, address, telephone number, home state, email address, and all contact information for the physician Susan Zonia removed as admitted in her deposition.

Response:

Interrogatory 43. Provide a detailed description of the testimony expected from each person listed in Plaintiff's Rule 26 disclosure.

Response:

Interrogatory 44. Produce all documentation or recordings regarding the use of pagers assigned to American University of Antigua College of Medicine students at St Joseph Mercy Oakland Hospital in 2007.

Response:

Interrogatory 45. State the basis for denying Steven Woodward legal counsel or a recording device during a Grievance Committee hearing.

Response:

Interrogatory 46. State the full and complete basis for the grievance procedures against Steven Woodward in December 2007?

Response:

Interrogatory 47. Did American University of Antigua College of Medicine inform Steven Woodward of the full and complete basis for the grievance procedures against him in December 2007?

Response:

Interrogatory 48. Did American University of Antigua College of Medicine inform Steven Woodward of the full and complete basis and/or name of the faculty that initiated the grievance procedure in August 2007?

Response:

Interrogatory 49. Has any group of American University of Antigua College of Medicine students signed petitions concerning the school or any AUA program? If so, produce a copy of all the petitions and any documentation surrounding the outcome of the petition.

Response:

Interrogatory 50. Did any faculty of American University of Antigua College of Medicine communicate to Jeffrey Yanez that there would be a 10% curve added to the December 2007 5<sup>th</sup> Semester Final Written Exam?

Response:

Interrogatory 51. What is the date American University of Antigua College of Medicine dismiss Steven Woodward?

Response:

Interrogatory 52. What date was the lawsuit, known as Case No. 07-088103-CZ, filed by the attorney for Steven Woodward concerning St Joseph Mercy Oakland Hospital, Susan Zonia, and employees of American University of Antigua College of Medicine?

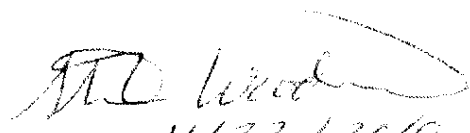
Response:

Interrogatory 53. What date did American University of Antigua College of Medicine issue grades to Steven Woodward for the December 2007 5<sup>th</sup> Semester course?

Response:

Interrogatory 54. State the name, address, telephone number, employer, driver's license number, and Social Security Number for everyone who has provided information to answer these Interrogatories.

Response:

  
11/22/2010

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA COLLEGE  
OF MEDICINE, Plaintiff

United States District Court  
Judge Patrick J. Duggan, presiding  
Michael Hluchaniuk, referral  
Case No.: 2:10-cv-10978

V  
Steven Woodward, Defendant

Eric A. Buikema (P58379)  
Cardelli, Lanfear & Buikema, P.C.  
Attorneys for Plaintiff  
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Royal Oak, MI 48067  
(248)544-1100  
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Steven Woodward  
7211 Brittwood Ln  
Flint, MI 48507  
steve\_\_L\_\_woodward@yahoo.com

**Defendant's Requests for Admissions**



### **Defendant's Requests for Admissions**

The Defendant Steven Woodward submits the following requests for admission. Your answer must admit the request, specifically deny the request, or make a statement that you cannot truthfully admit or deny the request. Fed. R. Civ. P. 36(a)(4). A denial must fairly respond to the substance of the matter. Fed. R. Civ. P. 36(a)(4). Pursuant to Fed. R. Civ. P. 36(a)(3) you have 30 days from the date of this request to respond.

Request 1.

Please admit that Jeffrey Yanez wrote: "After reviewing the final exam results AUA has decided to apply a 10% "curve".

Response:

Request 2.

Please admit that Jeffrey Yanez wrote "It is anticipated from AUA that you will only need 4-5 hours to complete this examination given the fact that you already know the questions and answers from the quizzes throughout the past 11 weeks.

Good Luck

PS- I took a look at the exam- The questions ARE the exact same as the ones you have already seen."

Response:

Request 3.

Please admit that Jeffrey Yanez wrote "AUA (Dr. Calderone) also noted that you scored 0 on the vocabulary and he wondering why or what happened."

Response:

Request 4.

Please admit that Jeffrey Yanez wrote "All the words from the definitions are listed" and that these "definitions" were the entire "Vocabulary" section of the Final Exam.

Response:

Request 5.

Please admit that the Final Written Exam given to 5<sup>th</sup> Semester students were given on different dates between the three clinical sites.

Response:

Request 6.

Please admit that Sallie Mea was not informed that loans were being issued to American University of Antigua College of Medicine students in 2006.

Response:

Request 7.

Please admit that American University of Antigua College of Medicine had a policy in 2007 that if a student passed the Shelf Exam that the student passed the course.

Response:

Request 8.

Please admit that American University of Antigua College of Medicine scheduled the Shelf Exam for their students at St Joseph Mercy Oakland Hospital.

Response:

Request 9.

Please admit that the American University of Antigua College of Medicine 5<sup>th</sup> Semester students at St Joseph Mercy Oakland Hospital did not receive the scheduled Shelf Exam in 2007.

Response:

Request 10.

Please admit that the students in the 2007 5<sup>th</sup> Semester program at St Joseph Mercy Oakland Hospital did not receive all the contractual clinical rotations.

Response:

Request 11.

Please admit that the Exam Master application did not work for any of the scheduled Friday Quizzes for the American University of Antigua College of Medicine students at St Joseph Mercy Oakland Hospital.

Response:

Request 12.

Please admit that the Exam Master application could not be used between October 21, 2007 and October 25, 2007.

Response:

Request 13.

Please admit that because Exam Master problems it was replaced with another software application for the Final Exam.

Response:

Request 14.

Please admit that American University of Antigua College of Medicine asks for student evaluations for courses.

Response:

Request 15.

Please admit that American University of Antigua College of Medicine published "AUA/KMC students are encouraged to address any academic or non-academic concerns with their Professors, Faculty Advisors or Deans."

Response:

Request 16.

Please admit that American University of Antigua College of Medicine published "The University adheres to the mandates of the United States Family Educational Rights and Privacy Act (FERPA)"

Response:

Request 17.

Please admit that Steven Woodward was dismissed from American University of Antigua College of Medicine on May 21, 2008.

Response:

Request 18.

Please admit that lawsuit Case No. 07-088103-CZ was filed on December 20, 2007.

Response:

Request 19.

Please admit that AUA 5<sup>th</sup> Semester Final Grades were issued to the students after December 20, 2007.

Response:

Request 20.

Please admit that the file <http://www.aaa-med.com/downloads/usmle-pass-rate.ppt> contains student grades and scores.

Response:

Request 21.

Plases admit that Exam Master software licensing agreement covers user name privacy.

Response:

Request 22.

Please admit that the Preliminary Clinical Medicine Course Guidelines\*(September 6 – December 21, 2007) states “You may choose any user name you would like to use”.

Response:

Request 23.

Please admit that American University of Antigua College of Medicine requested Susan Zonia write the Memo dated December 17, 2007.

Response:

Request 24.

Please admit that American University of Antigua College of Medicine allowed students located in Miami to attend a live Kaplan course during a 2007 5<sup>th</sup> Semester course.

Response:

Request 25.

Please admit that AUA students were exposed to PCP from an HIV positive patient during the 5<sup>th</sup> Semester at St Joseph Mercy Oakland.

Response:

Request 26.

Please admit that Steven Woodward communicated with AUA and St Joseph Mercy Oakland Hospital faculty concerning the PCP exposure but was not treated or examined for the exposure.

Response:

Request 27.

Please admit that AUA students during the 5<sup>th</sup> Semester Course at St Joseph Mercy Oakland hospital were not taught biohazard skills and precautions required to perform tests on PCP HIV infected patients.

Response:

Request 28.

Please admit that American University of Antigua College of Medicine has implemented , in part or in full, suggestions made by Steven Woodward.

Response:

Request 29.

Please admit that Dr. R. Sanii wrote "Dear Steve;

Thank you for your email. I did read your email with great interest and concern. I think you have brought up few very important and valuable points. I take it that you are very concern and care for this institute. Me too. I like to see student being motivated and have a chance to learn and advance in a very healthy scientific environment. I think it will be helpful ( may be productive) if we meet and put our thought together to find a solution for at least those issues related to SGA responsibility"

Response:

Request 30.

Please admit that Dr. Hayden wrote "I understand what you are saying and your input as well as your student colleagues is helpful and constructive. Change will come thanks to your efforts. Unfortunately, as a trail blazer, you yourself won't benefit from the path you are creating. But that's usually the case for leaders and forward thinkers."

Response:

Request 31.

Please admit Victor Hrehorovich distributed, communicated, and/or forwarded Steven Woodward's private username to a testing software application.

Response:

Request 32.

Please admit that Victor Hrehorovich distributed, communicated, and/or forwarded private emails from Steven Woodward.

Response:

Request 33.

Please admit that Neal Simon signed a contract between American University of Antigua College of Medicine and St Joseph Mercy Oakland Hospital.

Response:

Request 34.

Please admit that the contract between American University of Antigua College of Medicine and St Joseph Mercy Oakland Hospital states "The hospital agrees to provide support services including counseling for students"

Response:

Request 35.

Please admit that Jeffrey Yanez diagnosed Steven Woodward as having "episodes", "episodic", "He didn't seem to be able to control his emotions", "I was dealing with a child".

Response:

Request 36.

Please admit that Jeffrey Yanez did not documented any diagnosed behavioral problems concerning Steven Woodward.

Response:

Request 37.

Please admit that Jeffrey Yanez never notified AUA concerning any of Steven Woodward's episodes .

Response:

Request 38.

Please admit that St Joseph Mercy Oakland never provided counseling or support services to Steven Woodward.

Response:

Request 39.

Please admit that William Cain wrote "the documents I have received are evidence of absurd behavior".

Response:

Request 40.

Please admit William Cain never offered counseling to Steven Woodward during the 5<sup>th</sup> Semester.

Response:

Request 41.

Please admit the 5<sup>th</sup> Semester Syllabus states "including counseling"

Response:

Request 42.

Please admit William Cain refused to listen to Steven Woodward's exhibit during a Committee Meeting.

Response:

Request 43.

Please admit William Cain refused to have a Committee meeting recorded.

Response:

Request 44.

Please admit William Cain wrote "no recording device, no legal council" in a Notice of Grievance Committee hearing on December 19, 2007.

Response:

Request 45.

Please admit the AUA student handbook states "The student has the right to counsel and to present witnesses and documentary evidence".

Response:

Request 46.

Please admit that Steven Woodward earned and 80% for his 5<sup>th</sup> Semester Final Grade.

Response:

Request 47.

Please admit that Lekedra Evans earned an 83% for her 5<sup>th</sup> Semester Final Grade.

Response:

Request 48.

Please admit that Michael Ozuomba earned a 77% for his 5<sup>th</sup> Semester Final Grade.

Response:

Request 49.

Please admit that the AUA 5<sup>th</sup> Semester Syllabus defined how the 5<sup>th</sup> Semester course was graded.

Response:

Request 50.

Please admit that the AUA 5<sup>th</sup> Semester Syllabus states “ III. Evaluation and Grading  
A) Passing Grade Minimal requirements

\* Minimal total course grade 75%

\*Minimal lecture attendance 85% (18 lectures)

\*Minimal practical session attendance 85%

\*Minimal Hospital lectures and other Academic sessions attendance 50%

\*Minimal out-patient session attendance 90%

\*Minimal Correlation Course questions 80% (1,600)

\*Minimal total quizzes score 60%

\*Minimal final written exam score 80%

Minimal final practical exam Score 80%”

Response:

Request 51.

Please admit the 5<sup>th</sup> Semester Syllabus states “Their input is critical in developing and advancing the University’s academic program.”

Response:

Request 52.

Please admit AUA faculty teach wrong information.

Response:

Request 53.

Please admit Victor Hrehorovich wrote to Steven Woodward “Thank you for your suggestions. It’s an excellent one, of great educational and economic import”

Response:



Request 54.

Please admit Victor Hrhovich wrote to Steven Woodward "Your points are well taken"

Response:

Request 55.

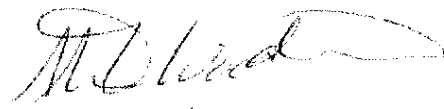
Please admit there were at least 20 schedule changes during the 2007 5<sup>th</sup> Semester program at St Joseph Mercy Oakland hospital.

Response:

Request 56.

Please admit Victor Hrhovich did not reply to Steven Woodward the answer to the following question "Since the word is you're failing a students this semester, I would like to know my standing in the class. Anything I need to be aware of that would jeopardize me getting out of this semester."

Response:

  
11/22/2010

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA COLLEGE  
OF MEDICINE, Plaintiff

United States District Court  
Judge Patrick J. Duggan, presiding  
Michael Hluchaniuk, referral  
Case No.: 2:10-cv-10978

V

Steven Woodward, Defendant

Eric A. Buikema (P58379)  
Cardelli, Lanfear & Buikema, P.C.  
Attorneys for Plaintiff  
322 W. Lincoln  
Royal Oak, MI 48067  
(248)544-1100  
ebuikema@cardellilaw.com

Steven Woodward  
7211 Brittwood Ln  
Flint, MI 48507  
steve\_L\_woodward@yahoo.com

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**Defendant's Requests for Production Pursuant to FRCP 34**

Defendant Steven Woodward pursuant to Fed. R. Civ. P. 34 requests production of documents, electronically stored information and tangible things as identified below. Pursuant to Fed. R. Civ. P. 34(b)(2), you have 30 days from being served to respond. You must produce this information as kept in the ordinary course of business or organize and label to correspond to the categories in the request. Fed. R. Civ. P. 34(b)(2)(E). Fed. R. Civ. P. 26(e) imposes a duty upon you to timely supplement your responses.

### **Definitions**

1. The letters "AUA" define the American University of Antigua College of Medicine, Greater Caribbean Learning Resources, GCLR, St Joseph Mercy Oakland Hospital, and any company or partner of the American University of Antigua College of Medicine; unless otherwise specified.
2. The words documents, records, communications, prescriptions, files, minutes, notifications, findings, process, petitions, warnings, reports, and things refer to all tangible material of any nature, including but not limited to, all written material such as graphs, charts, maps, drawings, correspondence, memoranda, records, notes, writings, manuals, books, photographs, recordings, images and all information stored electronically on a computer or archived software capable of reduction to a written document as well as all objects such as parts, pieces, samples, and related tangible things.
3. The words possession, custody, or control apply to all documents and things belonging to you that are in your possession, all documents and things belonging to others over which you have custody, and all documents and things in the custody of others over which you have the right of control.

### **Defendant's Request for Documentation**

1. Please produce a copy of all Nellie Mae Loan Certifications signed by any AUA employee.
2. Please produce a copy of all patient records for Steven Woodward concerning any clinical treatment provided by any AUA employee.
3. Please produce a copy of all patient records for Steven Woodward written by any AUA employee.
4. Please produce a copy of all counseling records for Steven Woodward written by any AUA employee.
5. Please produce a copy of all prescriptions for Steven Woodward for any clinical treatments provided by any AUA employee.
6. Please produce a copy of all records and documents between Peter Bell and Steven Woodward.
7. Please produce a copy of all communications between any AUA employee and Stuart A Lockhart concerning Steven Woodward.

8. Please produce a copy of all communications to or from Neal S. Simon concerning Steven Woodward.
9. Please produce a copy of all communications to or from Peter Bell concerning Steven Woodward.
10. Please produce a copy of all communications between any AUA employee and any St Joseph Mercy Oakland Hospital employee concerning Steven Woodward.
11. Please produce a copy of the email written by Jorge Calderon to Susan Zonia dated Saturday, December 15, 2007 subject: Fwd: Planning the grievance hearing including the "note" from Dr. Cain.
12. Please produce all communications by Victor Hrehorovich concerning Steven Woodward.
13. Please produce all communications by Jorge Calderon concerning Steven Woodward.
14. Please produce all communications by Jeffrey Yanez concerning Steven Woodward.
15. Please produce all communications by Susan Zonia concerning Steven Woodward.
16. Please produce all communications by Deneen McCall concerning Steven Woodward.
17. Please produce all communications by William Cain concerning Steven Woodward.
18. Please produce a copy of all documentation identified by Plaintiff's Rule 26 disclosures.
19. Please produce a copy of all exhibits or demonstrative aids which the Plaintiff intends to rely upon at trial.
20. Please produce a complete copy of the AUA student file for Steven Woodward.
21. Please produce a copy of all files AUA has concerning Steven Woodward.
22. Please produce a copy of all meeting minutes pertaining to Steven Woodward.
23. Please provide a copy of all reports, findings, and recommendations used to form the basis for all Grievance Committee Meeting findings concerning Steven Woodward.
24. Please produce a copy of all written communications between AUA and St Joseph Mercy Oakland Hospital pertaining the December 2007 Grievance with Steven Woodward.

25. Please produce a copy of all voice recordings regarding the December 2007 Grievance concerning Steven Woodward.
26. Please produce meeting minutes for any appeal Steven Woodward filed with AUA.
27. Please produce a copy of all grievance meeting minutes concerning Steven Woodward and AUA.
28. Please produce a copy of all findings regarding any grievances AUA had with Steven Woodward.
29. Please produce a copy of all grievance meeting notifications between William Bullock Stewart and AUA.
30. Please produce a copy of all grievance meeting findings AUA documented concerning the William Bullock Stewart.
31. Please provide a copy of all reports, findings, and recommendations used to form the basis for any Grievance Committee Meeting finding for William Bullock Stewart.
32. Please produce a copy of all grievance meeting notifications between Syed Noori and AUA.
33. Please produce a copy of all grievance meeting findings AUA documented concerning Syed Norri.
34. Please provide a copy of all reports, findings, and recommendations used to form the basis for any Grievance Committee Meeting findings for Syed Noori.
35. Please produce a copy of all grievance meeting notifications to any AUA student.
36. Please produce a copy of all findings regarding all grievances AUA has had with any of their students.
37. Please produce a copy of the process used by Neal Simon to ensure wrong information is not taught on Antigua at AUA while he is at his Wall Street Office or away from Antigua.
38. Please produce a copy of all communications between AUA employees and St Joseph Mercy Oakland Hospital employees concerning the use of pagers during the 5<sup>th</sup> Semester Course.
39. Please produce a copy of all communications between AUA and St Joseph Mercy Oakland Hospital concerning the number of patients students need to document during the 5<sup>th</sup> Semester cours.

40. Please produce a copy of all communications between AUA and St Joseph Mercy Oakland Hospital concerning defending an epithet.
41. Please produce a copy of the "Final Grades by Component - Fall, 2007".
42. Please produce a copy of all safety warnings AUA has issued to their students.
43. Please produce a copy of all reports on crime published by AUA for any site where their students reside.
44. Please produce a copy of all petitions submitted to AUA by any members of their student population.
45. Please produce a copy of all documentation concerning Shelf Exam policies concerning AUA students passing courses.
46. Please produce a copy of all documentation

*At. Ward*  
11/22/2010

**From:** Steve Woodward (steve\_1\_woodward@yahoo.com)  
**To:** ebuikema@cardellilaw.com; marilyn\_orem@mied.uscourts.gov;  
**Date:** Fri, December 17, 2010 9:29:00 PM  
**Cc:**  
**Subject:** Re: AUA v Woodward

Dear Mr Buikema,

You are the one that needs the opportunity for discovery, not me.

You are the one that filed the "Request for Entry of Default", thereby wasting the Court's time and money and burdening everyone involved, and wasted our originally scheduled time for Discovery and Motions, not me.

You are the one that filed for and adjournment to conduct discovery, it's obvious you don't have the evidence to support your claims, not me.

You are the one that filed for second adjournment, further demonstrating you don't have the evidence to support your claims, not me.

Your client is the one that is "supposedly" being damaged daily, yet you did not want to, or did not have the evidence to support your claims for our original scheduled trial, again burdening everyone involved.

The mere fact that you filed for two adjournments, demonstrates at least, the following:

1. You do not have the evidence to support your claims.
2. Your client is not being irreparably injured.
3. Your client's reputation is not being damaged, and that I'm must not be causing your client any damages at all.

We now have until around June to think about things, so lets hope you will be ready by then.

One would think, you would have been able to support your claims prior to filing Document 1, but this is obviously not the case, as remarked by the Honorable Judge Patrick J. Duggan.

Please plan on bringing all of the documentation and answers as I previously requested to the December 22nd Hearing so we don't need to be further burdened over the holidays.

Thank you for your time and have a good day,

Steven Woodward

This email and any attachments are intended for the sole use of the named recipient(s) and contain(s) confidential information that may be proprietary, privileged or copyrighted under applicable law. If you are not the intended recipient, do not read, copy, or forward this email message or any attachments. Delete this email message and any attachments immediately.

**EXHIBIT 3**

**From:** Eric A Buikema <ebuikema@cardellilaw.com>  
**To:** Steve Woodward <steve\_l\_woodward@yahoo.com>  
**Sent:** Tue, December 14, 2010 10:53:46 AM  
**Subject:** AUA v Woodward

Mr. Woodward,

Also please advise if you will consent to an extension of the discovery schedule so that we have a realistic opportunity to conduct discovery after the pending motion hearings on December 22nd or if you care to even discuss the same.

Regards,

Eric A. Buikema, Attorney at Law  
Cardelli, Lanfear & Buikema, P.C.  
322 West Lincoln Avenue  
Royal Oak, Michigan 48067  
(248) 544-1100  
(248) 544-1191 fax  
ebuikema@cardellilaw.com



UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA COLLEGE  
OF MEDICINE, a foreign corporation,

Plaintiff,

V

STEVEN L. WOODWARD,

Defendant.

United States District Court Judge  
Patrick J. Duggan, presiding  
Michael Hluchaniuk, referral  
Case No.: 2:10-cv-10978

|                                                                                                                                                                                 |                                                                                                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| Eric A. Buikema (P58379)<br>CARDELLI, LANFEAR & BUIKEMA, P.C.<br>Attorneys for Plaintiff<br>322 W. Lincoln<br>Royal Oak, MI 48067<br>(248) 544-1100<br>ebuikema@cardellilaw.com | STEVEN L. WOODWARD<br>In Pro Per<br>c/o 7211 Brittwood Lane<br>Flint, MI 48507<br>Steve_L_woodward@yahoo.com |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|

**PLAINTIFF'S RESPONSE TO DEFENDANT'S REQUESTS FOR  
ADMISSIONS DATED NOVEMBER 22, 2010**

Request 1.

Please admit that Jeffrey Yanez wrote: "After reviewing the final exam results AUA has decided to apply a 10% "curve".

**Response:**

Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Without waving this objection, see Dr. Yanez's deposition transcript from the prior court proceedings.

Request 2.

Please admit that Jeffrey Yanez wrote "It is anticipated from AUA that you will only need 4-5 hours to complete this examination given the fact that you already know the questions and answers from the quizzes throughout the past 11 weeks.

Good Luck

PS- I took a look at the exam- The questions ARE the exact same as the ones you have already seen."

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Without waving this objection, see Dr. Yanez's deposition transcript from the prior court proceedings.**

Request 3.

Please admit that Jeffrey Yanez wrote "AUA (Dr. Calderone) also noted that you scored 0 on the vocabulary and he wondering why or what happened."

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Without waving this objection, see Dr. Yanez's deposition transcript from the prior court proceedings.**

Request 4.

Please admit that Jeffrey Yanez wrote "All the words from the definitions are listed" and that these "definitions" were the entire "Vocabulary" section of the Final Exam.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Without waving this objection, see Dr. Yanez's deposition transcript from the prior court proceedings.**

Request 5.

Please admit that the Final Written Exam given to 5<sup>th</sup> Semester students were given on different dates between the three clinical sites.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Plaintiff further objects to this request as vague and not reasonably limited in scope.**

Request 6.

Please admit that Sallie Mea was not informed that loans were being issued to American University of Antigua College of Medicine students in 2006.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Without waving said objection, Plaintiff can neither admit nor deny this request as it does not know what "Sally Mea" was informed or not informed.**

Request 7.

Please admit that American University of Antigua College of Medicine had a policy in 2007 that if a student passed the Shelf Exam that the student passed the course.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 8.

Please admit that American University of Antigua College of Medicine scheduled the Shelf Exam for their students at St Joseph Mercy Oakland Hospital.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 9.

Please admit that the American University of Antigua College of Medicine 5<sup>th</sup> Semester students at St Joseph Mercy Oakland Hospital did not receive the scheduled Shelf Exam in 2007.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 10.

Please admit that the students in the 2007 5<sup>th</sup> Semester program at St Joseph Mercy Oakland Hospital did not receive all the contractual clinical rotations.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 11.

Please admit that the Exam Master application did not work for any of the scheduled Friday Quizzes for the American University of Antigua College of Medicine students at St Joseph Mercy Oakland Hospital.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 12.

Please admit that the Exam Master application could not be used between October 21, 2007 and October 25, 2007.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 13.

Please admit that because Exam Master problems it was replaced with another software application for the Final Exam.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 14.

Please admit that American University of Antigua College of Medicine asks for student evaluations for courses.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 15.

Please admit that American University of Antigua College of Medicine published "AUA/KMC students are encouraged to address any academic or non-academic concerns with their Professors, Faculty Advisors or Deans."

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 16.

Please admit that American University of Antigua College of Medicine published "The University adheres to the mandates of the United States Family Educational Rights and Privacy Act (FERPA)"

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 17.

Please admit that Steven Woodward was dismissed from American University of Antigua College of Medicine on May 21, 2008.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 18.

Please admit that lawsuit Case No. 07-088103-CZ was filed on December 20, 2007.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Without waiving said objection, Plaintiff states that Defendant filed his Oakland County Court Case No. 07-088103-CZ on December 20, 2007 and that this is a matter of public record.**

Request 19.

Please admit that AUA 5<sup>th</sup> Semester Final Grades were issued to the students after December 20, 2007.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 20.

Please admit that the file <http://www.aua-med.com/downloads/usmle-pass-rate.ppt> contains student grades and scores.

**Response:**

**Admitted that Defendant has wrongfully published confidential student data and information.**

Request 21.

Plases admit that Exam Master software licensing agreement covers user name privacy.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 22.

Please admit that the Preliminary Clinical Medicine Course Guidelines\*(September 6 – December 21, 2007) states "You may choose any user name you would like to use".

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 23.

Please admit that American University of Antigua College of Medicine requested Susan Zonia write the Memo dated December 17, 2007.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 24.

Please admit that American University of Antigua College of Medicine allowed students located in Miami to attend a live Kaplan course during a 2007 5<sup>th</sup> Semester course.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 25.

Please admit that AUA students were exposed to PCP from an HIV positive patient during the 5<sup>th</sup> Semester at St Joseph Mercy Oakland.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 26.

Please admit that Steven Woodward communicated with AUA and St Joseph Mercy Oakland Hospital faculty concerning the PCP exposure but was not treated or examined for the exposure.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 27.

Please admit that AUA students during the 5<sup>th</sup> Semester Course at St Joseph Mercy Oakland hospital were not taught biohazard skills and precautions required to perform tests on PCP HIV infected patients.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Without waiving said objections, Plaintiff states that its students were provided a first-rate medical education.**

Request 28.

Please admit that American University of Antigua College of Medicine has implemented , in part or in full, suggestions made by Steven Woodward.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 29.

Please admit that Dr. R. Sanii wrote "Dear Steve;

Thank you for your email. I did read your email with great interest and concern. I think you have brought up few very important and valuable points. I take it that you are very concern and care for this institute. Me too. I like to see student being motivated and have a chance to learn and advance in a very healthy scientific environment. I think it will be helpful ( may be productive) if we meet and put our thought together to find a solution for at least those issues related to SGA responsibility"

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 30.

Please admit that Dr. Hayden wrote "I understand what you are saying and your input as well as your student colleagues is helpful and constructive. Change will come thanks to your efforts. Unfortunately, as a trail blazer, you yourself won't benefit from the path you are creating. But that's usually the case for leaders and forward thinkers."

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 31.

Please admit Victor Hrehorovich distributed, communicated, and/or forwarded Steven Woodward's private username to a testing software application.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 32.

Please admit that Victor Hrehorovich distributed, communicated, and/or forwarded private emails from Steven Woodward.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 33.

Please admit that Neal Simon signed a contract between American University of Antigua College of Medicine and St Joseph Mercy Oakland Hospital.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Without waiving said objection, Plaintiff admits that it has a contractual relationship with the Trinity-Health Michigan.**



Request 34.

Please admit that the contract between American University of Antigua College of Medicine and St Joseph Mercy Oakland Hospital states "The hospital agrees to provide support services including counseling for students"

**Response:**

Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Plaintiff further states that no third-party beneficiary contract claims were made either in the state court case or the instant case.

Request 35.

Please admit that Jeffrey Yanez diagnosed Steven Woodward as having "episodes", "episodic", "He didn't seem to be able to control his emotions", "I was dealing with a child".

**Response:**

Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Plaintiff admits that Defendant's unprofessionalism is well documented and was deemed unprofessional by Judge Shalina Kumar in dismissing his claims against Trinity Health Michigan and Dr. Susan Zonia.

Request 36.

Please admit that Jeffrey Yanez did not documented any diagnosed behavioral problems concerning Steven Woodward.

**Response:**

Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Plaintiff admits that Defendant's unprofessionalism is well documented and was deemed unprofessional by Judge Shalina Kumar in dismissing his claims against Trinity Health Michigan and Dr. Susan Zonia.

Request 37.

Please admit that Jeffrey Yanez never notified AUA concerning any of Steven Woodward's episodes .

**Response:**

Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Plaintiff admits that Defendant's unprofessionalism is well documented and was deemed unprofessional by

**Judge Shalina Kumar in dismissing his claims against Trinity Health Michigan and Dr. Susan Zonia.**

Request 38.

Please admit that St Joseph Mercy Oakland never provided counseling or support services to Steven Woodward.

**Response:**

**Plaintiff cannot admit or deny this interrogatory as it cannot speak for St. Joseph Mercy Oakland.**

Request 39.

Please admit that William Cain wrote "the documents I have received are evidence of absurd behavior".

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Plaintiff admits that Defendant's unprofessionalism is well documented and was deemed unprofessional by Judge Shalina Kumar in dismissing his claims against Trinity Health Michigan and Dr. Susan Zonia.**

Request 40.

Please admit William Cain never offered counseling to Steven Woodward during the 5<sup>th</sup> Semester.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Plaintiff admits that Defendant's unprofessionalism is well documented and was deemed unprofessional by Judge Shalina Kumar in dismissing his claims against Trinity Health Michigan and Dr. Susan Zonia.**

Request 41.

Please admit the 5<sup>th</sup> Semester Syllabus states "including counseling"

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 42.

Please admit William Cain refused to listen to Steven Woodward's exhibit during a Committee Meeting.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 43.

Please admit William Cain refused to have a Committee meeting recorded.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 44.

Please admit William Cain wrote "no recording device, no legal council" in a Notice of Grievance Committee hearing on December 19, 2007.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 45.

Please admit the AUA student handbook states "The student has the right to counsel and to present witnesses and documentary evidence".

**Response:**

**Admitted.**

Request 46.

Please admit that Steven Woodward earned and 80% for his 5<sup>th</sup> Semester Final Grade.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 47.

Please admit that Lekedra Evans earned an 83% for her 5<sup>th</sup> Semester Final Grade.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Plaintiff further objects to this request as federal law and regulations prohibit it from disclosing private and confidential student information without a release and protective order.**

Request 48.

Please admit that Michael Ozuomba earned a 77% for his 5<sup>th</sup> Semester Final Grade.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks. Plaintiff further objects to this request as federal law and regulations prohibit it from disclosing private and confidential student information without a release and protective order.**

Request 49.

Please admit that the AUA 5<sup>th</sup> Semester Syllabus defined how the 5<sup>th</sup> Semester course was graded.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 50.

Please admit that the AUA 5<sup>th</sup> Semester Syllabus states " III. Evaluation and Grading

A) Passing Grade Minimal requirements

\* Minimal total course grade 75%

\*Minimal lecture attendance 85% (18 lectures)

\*Minimal practical session attendance 85%

\*Minimal Hospital lectures and other Academic sessions attendance 50%

\*Minimal out-patient session attendance 90%

\*Minimal Correlation Course questions 80% (1,600)

\*Minimal total quizzes score 60%

\*Minimal final written exam score 80%

Minimal final practical exam Score 80%"

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 51.

Please admit the 5<sup>th</sup> Semester Syllabus states "Their input is critical in developing and advancing the University's academic program."

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 52.

Please admit AUA faculty teach wrong information.

**Response:**

**Denied.**

Request 53.

Please admit Victor Hrehorovich wrote to Steven Woodward "Thank you for your suggestions. It's an excellent one, of great educational and economic import"

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 54.

Please admit Victor Hrehorovich wrote to Steven Woodward "Your points are well taken"

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 55.

Please admit there were at least 20 schedule changes during the 2007 5<sup>th</sup> Semester program at St Joseph Mercy Oakland hospital.

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Request 56.

Please admit Victor Hrehorovich did not reply to Steven Woodward the answer to the following question "Since the word is you're failing a students this semester, I would like to know my standing in the class. Anything I need to be aware of that would jeopardize me getting out of this semester."

**Response:**

**Plaintiff objects to this request as irrelevant to the claims and defenses in this case of whether Defendant defamed Plaintiff or violated Plaintiff's marks.**

Respectfully submitted,

/s/ Eric A. Buikema (P58379)  
Eric A. Buikema (P58379)  
Cardelli, Lanfear & Buikema, P.C.  
322 West Lincoln Avenue  
Royal Oak, Michigan 48067  
(248) 544-1100  
[ebuikema@cardellilaw.com](mailto:ebuikema@cardellilaw.com)